

CLERK'S OFFICE U.S. DIST. COURT
AT CHARLOTTESVILLE, VA
FILED

OCT 08 2020

JULIA G. DUBLET, CLERK
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VIRGINIA:

IN THE U.S. DISTRICT COURT
WESTERN DISTRICT OF VIRGINIA

JOHN EDWARD HALL,

)

Plaintiff,

)

VS.

)

Case No.: CL20-1426

ALBEMARLE COUNTY SCHOOL BOARD,

)

And

)

MATT HAAS, PHD – SUPERINTENDENT,

)

*20 OCT 8 PM 12:46

Defendants.

)

ANSWER TO DEMURRER ALLEGATIONS WITH NEW FACTS & ALLEGATIONS

COME NOW, plaintiff John Edward Hall (JEH), of counsel, to answer the 7 allegations in Defendant's demur, as to why defendants should be compelled by the court to respond and be further obliged to continue revealing defendant Matt Haas's reasoning by Matt Haas, PhD, himself, to facts now conceded as true by choice of the word demurrer by defendants counsel and the Albemarle County School Board personnel's role in this matter now in the U.S. District Court.

Plaintiff intends to illustrate and reveal to the court and public the facts of this case; that there are legal consequences and entitlements to just monetary remedy when a complaint so tested, is found to be sufficient and sound in order to justify collection of the monetary remedy requested. That said, I will now answer the 7 allegations put forth by defendant's counsel Jennifer Royer (JR), a fair Roanoke lawyer, in her Demurrer, as follows:

1. JR: The Complaint fails to state a claim for a violation of plaintiff's Fourteenth Amendment rights.

A. JEH: In the Constitution of the United States, in Section 1, it is very clear that no state shall make or enforce any law which shall abridge the privileges or immunities of citizens of the United States. As a corollary, it is true that Dr. Haas holds a powerful position as superintendent of Albemarle County Schools and he governs the schools in the favor of the school board with their consent in the decisions he makes, such as putting a No Trespassing Debarment on me when I did not deserve it. He enjoys immunity because he is the superintendent of Albemarle County Schools. But if he willfully breaks the law, he is seen in a different light in the eyes of the world and school board. No man is above the law. Since Matt Haas is an individual for what and in what he has done, I am suing the individual Matt Haas, PhD and if I win, he should pay out of his own pocket. It is for the judge to decide whether the school board should be held responsible by their callous indifference in this matter which is to be revealed.

I have not been employed by Albemarle County schools except as a substitute teacher years ago when I was first barred by Albemarle County schools for walking the paths behind our house at Baker-Butler Elementary School—another case of false arrest and imprisonment in a mental institution as my punishment, for many months. In this present matter, Dr. Haas was approached by me to have lifted a debarment from Charlottesville Albemarle Technical Education Center (Catec) in Feb '19 put in place by Dr. Daphne Keiser, head at the time. Aside: This will be dealt with in another lawsuit against Daphne Keiser, PhD as will be in one against Nicholas King, PhD, all of Albemarle County Schools, as administrators.

Section 1 of the US Constitution to continue after the (;), nor shall any state deprive any person of life, liberty, or property without due process of law. In applying the No Trespassing debarment, Dr. Haas again took away the prospect of my being happy, took away my liberty in many ways to befriend people who form opinions of my character without really knowing my character. They rely on rumor and false accusation. I had befriended Carol Roob, culinary chef at Catec who was

delighted to work with me to solarize the food mobile at Catec and elsewhere, from the first day we met. Dr. Daphne Keiser and Dr. Matt Haas effectively took away my happiness in this because invention ie. needed innovation, is a part of my being. By being falsely accused and having me falsely arrested by Dr. Nicholas King, PhD., Director of Student Services for trespassing, took away from me, my quality of life and liberty. I was required to report on a daily basis to OAR—offender aid and restoration, a demeaning punishment as part of a false judgment that I was an offender. Again, there is no real due process of law. How much longer will this bankrupt system of justice endure? There was never any due process of law at any time in all the times I have been TDO'd and ECO'd in my life—just the brutality and punishment borne of false judgment by lay members of the public who are not qualified to judge the mind. A stigmatized person is deprived of the equal protection of the laws and no judge except the Supreme Judge and being—God Almighty, seems to care—or acknowledge this truth.

2. JR: To the extent that the plaintiff attempts to assert a claim for defamation, the complaint fails to state a claim for defamation.

A. JEH: Dr. Matt Haas has been accused of violating the 14th Amendment Rights of Ira Socol, the division's former chief technology officer, fired in July, 2019 by Dr. Haas. In September, 2019, Socol sued Haas and the Albemarle County School Board for defamation, breach of contract and violating his right to due process of law.

The Federal Court under US District Judge Glen Conrad ruled the case can move forward, citing merit to due process and defamation arguments. Dr. Haas accused Ira Socol of violating the county's purchasing and procurement policies by spending a lot of money for furniture at the school division's new high school center. In a 27 page opinion, the judge agreed that Haas may have violated Socol's due process rights and defamed him.

In the present case, news media during my campaign for Charlottesville City Council put me in a negative light saying I was banned from Albemarle County Schools. Nicholas King, PhD., Director of

student services, wrote me a poison pen letter extending the ban to the entire Lane office building and fixed assets in all Albemarle Co Schools and had me false arrested for trespassing when I did not trespass. He wrote the letter apparently to cover his backside but this shows the depraved influence of Dr. Matt Haas over him. I have coined a term and a word to describe the way a bully and a tyrant brainwashes people they supervise into doing their sick, evil wills against innocent people. It is "psychodynamics". Dr. Matt Haas told me that he knew I worked with Dean Tisdadt, COO during the Pam Moran, PhD, administration as superintendent of Albemarle County Schools, lifted the ban and we were friends from then on. Dr. Daphne Keiser apparently knew something about me and the stigma I bear and must have an ignorant interpretation of it for she said in her February '19 No Trespassing debarment letter that I could appeal it to her or Dr. Haas in the future. Dr. Haas told me that he knew of Dean Tisdadt working with me and he said he counseled Dean against lifting the ban. All this, and I was a complete stranger except for brief encounters, with Dr. Haas at that time. Perhaps he was jealous of me when I tried to influence Dr. Moran against spending money to install artificial turf at High School football fields at that time due to the cancer risk for the student athletes and referees. I want to examine Dr. Haas in court on so many of my questions so I and the court, can form a valid opinion of his psyche and motivations. I want the opportunity to reveal what I know about psychology and have my psychiatrist, Dr. David T. Moody, be there, and comment as an expert witness as to what he sees in me and Dr. Haas. If the court directs, I will compensate Dr. Moody. It is up to the judge. Dr. Moody is a psychiatrist, psychologist and a neurologist at the Region 10 Pact team who I have known now for many years.

So yes, I have been defamed throughout my life due to the stigma I bear, in the eyes of strangers, family, friends and associates.

3. JR: The Plaintiff's claims are barred by applicable statutes of limitations.
 - A. JEH: In Virginia, I wish to note, there are no statutes of limitations for felonies committed against individuals. I would be delighted to see Matt

Haas, as part of his punishment when Covid-19 is finally over, have to report to OAR on a daily basis for a very long time or suffer the consequences if he does not.

Dr. Haas's letter debarment dated May 9, 2019 started the clock on the statute of limitations in this matter. I accuse herein Defendant's counsel of being deceptive and trying to mislead the court on the statute of limitations. Furthermore, from June, 2019 until the present, I kept her clerk and Hon. Judge Cheryl Higgins well informed of this matter until she finally dished off to Jon Zug, clerk of the Albemarle County Circuit Court, to assist me on the correct protocol to act as a lawyer while being indigent. I won my first judgment in a notice to vacate my premises during Covid-19, perhaps to the chagrin of Ralph Northam, governor of Virginia, my home and premises for tenant non-payment of utilities and rent in the months up until August '20, while I was incarcerated in Piedmont Geriatric Hospital from false arrest and imprisonment. I do not think of myself in a slur way as pro se although my law degree is spiritual in nature. Professionals, whether or not licensed, are paid handsomely for truth revealed to the eyes and ears of the court about the evil nature of defendants, some judges and defendant entities having great monetary wealth, even in the face of barriers put up by greedy amateur and professional lawyers having a license to practice in Virginia who try and often succeed in interdicting judgment in a court of law.

4. JR: The School Board is entitled to sovereign immunity for any claims arising in tort.
 - A. JEH: As a professional body and entity, according to a VSBA official, school board members can be the object of a lawsuit and can be made to pay penalties and awards set in civil actions. So, it depends on the suit and the judge's ruling. The way the law was changed, they can be held personally and corporately liable. Matt Haas, Superintendent of Albemarle County Schools, is a lead member of the Albemarle County School Board because of the direction he provides.

I was false arrested for trespass at Albemarle County Schools. I was forced by judge William Barkley to pay \$950 to a lawyer to represent me in order to get a null pros verdict so I could contest the harsh judgment and acts of Nicholas King, PhD, who had me false arrested and taken to jail. I am not suing schools which are part of government. I am suing individuals in schools, the courts and government and that is why I should prevail and the judge make them pay the judgment and attorney fees to me. I am naming the school board due to their personal indifference towards me and of this, I shall explain in this document. It is for the judge to decide whether the school board and tax payers should pay for their callous indifference.

5. JR: Although the School Board is identified as a party defendant, the plaintiff states no facts sufficient to state any claim against the School Board.

A. JEH: The role of superintendent Matt Haas is to serve as the Albemarle County School Board's chief adviser on educational matters and as the district's educational leader. He is responsible for ensuring that the board is informed about school district operations and activities, and about the district's needs.

Gossip and judgment entry to condemn people like myself and Ira Socal is not in the role of a school superintendent who doesn't seem to show any mercy in his judgments, just selfishness. Matt Haas has shown a disturbing history of conflicting with teachers such as those at Cale Elementary school, operating officers such as Dean Tisdadt in the Pam Moran Administration and Pam Moran along with himself in the Ira Socal fiasco. He informs the school board of such matters as these regarding people he fires, condemns or offends, that are a part of the K-12 Albemarle Schools family. Even with outsiders such as me. I want to know why? I want to know why he thinks I am a danger to every teacher and student at Albemarle County Schools. What evidence does he have of this? I asked the School Board to come to my rescue. I wrote an e letter to all school board members dated Sunday, July 14, 2019 regarding what Matt Hass, PhD., Dr. Nicholas King and Dr. Daphne Keiser

had done to me. I said that I would appreciate individual member responses and thoughts about my letter. Not one School Board member reached out to me. Yet they received the Nicholas King, PhD letter with hearty approbation. Because of their indifference and lack of humanity towards me, I claim all these facts as being sufficient to justify and award me treble damages ie. \$3,000,000 as judgment in my favor against Matt Haas and the Albemarle County School Board.

6. JR: The Complaint fails to state a claim for which treble damages may be awarded.

A. JEH: By Defense Counsel's choice of the word Demurrer, she concedes and conceded that the facts presented in my first pleading in my complaint are true. The damage done has been long lasting over many years since Dr. Matt Haas was a younger man and much more fair in looks than at present. He formed an opinion of me long ago and his mind and heart are now hard towards me like stone. His mind is made up. I don't fully understand this. I want to know more in court. This is all in the forensic realm now. I want to understand what makes Matt Haas in heart and Mind tic towards me. I want to reveal that truth and collect my trebled tax free remedy, so I can now give birth to John E. Hall Technologies, LLC, a Virginia stock corporation, protecting the Knees of student athletes in contact sports from injury and bracing for casual dress in the general public.

Dr. Matt Haas has been repeatedly repressive and oppressive in his tactics toward me. He has made accusations by whim that he cannot substantiate with proof about me. He has been hurtful and dishonest about me. He has no real power over me because I am a private citizen and not employed by Albemarle County Schools. I want to know what else he has said about me to others behind my back in the way he revealed what he said to Dean Tisdadt in counseling Dean not to lift the debarment in the Pam Moran administration. I want to know about Matt Hass as a disciplinarian. Is he a just or unjust man? Is he a balanced individual? I have cause to doubt in the integrity of Matt Haas and those who do his dirty work. If I reveal what I suspect about his true

nature to a candid court, I am sure I will receive the treble damages I seek.

7. JR: The Complaint fails to state a claim for attorney's fees.

A. JEH: It is customary for the judge to award attorney fees in the General District & Charlottesville Circuit Courts where I have been practicing law as a litigant in 2020. If the court so directs me now to state what that amount should be, may it be predicated out of dignity and respect accorded me. I now consider myself to be worth \$250.00 per hour for trial preparation and \$250.00 per hour for trial prosecution.

WHEREUPON, plaintiff John Edward Hall, pro Just Doc (JD), request that this case go forward to trial and hearing dates set, and for such other attorney fees and further relief as the nature of this case and this Court deems appropriate.

JOHN EDWARD HALL

 Plaintiff
JD of counsel

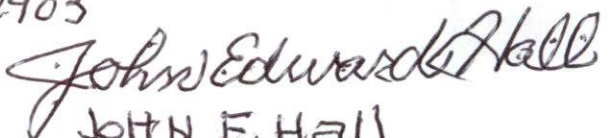
Date: TH 10-8-2020

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the ~~8th~~ 11th day of October, 2020, I caused a true copy of the foregoing to be sent to the following by US Mail:

John E. Hall
2427 Sunset Road
Charlottesville, Virginia 22903

Jennifer D. Royer Esq AC
1901 Denniston Ave SW
Roanoke, VA 24015


JOHN E. HALL

VIRGINIA:

IN THE CIRCUIT COURT FOR THE COUNTY OF ALBEMARLE

JOHN EDWARD HALL,

Plaintiff,

v.

ALBEMARLE COUNTY SCHOOL BOARD,

and

MATT HAAS, PHD – SUPERINTENDENT,

Defendants.

Case No.: CL20-1426

DEMURRER

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COME NOW, defendants Albemarle County School Board and Matthew Haas (sued herein as “Matt Haas, PhD – Superintendent”), by counsel, and demur to the Complaint and state that it is insufficient as a matter of law and ought not be prosecuted for the following reasons:

1. The Complaint fails to state a claim for a violation of plaintiff’s Fourteenth Amendment rights.
2. To the extent that the plaintiff attempts to assert a claim for defamation, the Complaint fails to state a claim for defamation.
3. The plaintiff’s claims are barred by applicable statutes of limitations.
4. The School Board is entitled to sovereign immunity for any claims arising in tort.
5. Although the School Board is identified as a party defendant, the plaintiff states no facts sufficient to state any claim against the School Board.
6. The Complaint fails to state a claim for which treble damages may be awarded.

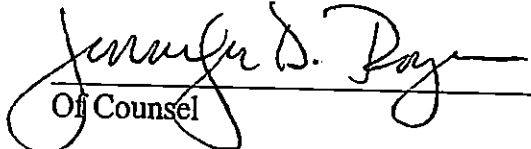
7. The Complaint fails to state a claim for attorneys' fees.

WHEREUPON, defendants Albemarle County School Board and Matthew Haas (sued herein as "Matt Haas, PhD – Superintendent"), by counsel, request that the case against them be dismissed and for such other and further relief as the nature of this case and this Court deems appropriate.

ALBEMARLE COUNTY PUBLIC
SCHOOLS

and

MATTHEW HAAS

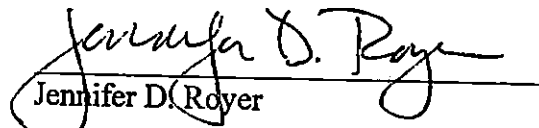

Of Counsel

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Counsel for Defendants

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 1st day of October, 2020, I caused a true copy of the foregoing to be sent to the following via US Mail:

John E. Hall
2427 Sunset Road
Charlottesville, Virginia 22903


Jennifer D. Royer

VIRGINIA:

IN THE CIRCUIT COURT FOR THE COUNTY OF ALBEMARLE

JOHN EDWARD HALL,

Plaintiff,

v.

ALBEMARLE COUNTY SCHOOL BOARD,

and

MATT HAAS, PHD – SUPERINTENDENT,

Defendants.

Case No.: CL20-1426

*20 OCT 8 PM 12:47

NOTICE OF FILING NOTICE OF REMOVAL

PLEASE TAKE NOTICE that on this 1st day of October, 2020, defendants Albemarle County School Board and Matt Haas, by counsel, filed with the United States District Court for the Western District of Virginia, Charlottesville Division, a Notice of Removal which effected removal of this case to the United States District Court for the Western District of Virginia.

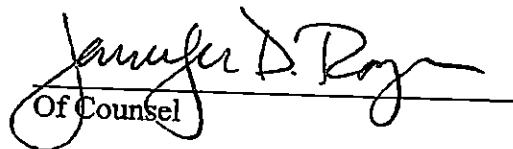
Pursuant to U.S.C. Section 1446(d), no further action should be taken in this Court unless and until the action is remanded to this Court.

Respectfully submitted,

ALBEMARLE COUNTY SCHOOL
BOARD

and

MATT HAAS


Of Counsel